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June 14, 2021

Via ECF

The Honorable John G. Koeltl
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Freedom of the Press Found. v. DOJ*, Case No. 1:17-cv-9343-JGK (S.D.N.Y.)

Dear Judge Koeltl,

Pursuant to the Court's May 11, 2021 scheduling order, ECF No. 80, I write on behalf of both parties to update the Court on the status of negotiations over attorney's fees and expenses.

Since the parties' last update on May 10, 2021, ECF No. 79, we have continued to communicate in good faith to reach an agreement on attorney's fees. On Friday, June 11, the parties came to an agreement in principle that would obviate the need for motion practice in this case. To allow time to finalize this agreement, we respectfully propose that the parties file a joint stipulation and proposed order of dismissal by Tuesday, July 6, 2021.

Respectfully,

/s/ Anna Diakun

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